

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

STATE OF ALABAMA, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF COMMERCE, et al.,

Defendants,

DIANA MARTINEZ, et al.,

Defendant-Intervenors,

and

COUNTY OF SANTA CLARA,
CALIFORNIA, et al.,

Defendant-Intervenors.

Case No.: 2:18-cv-00772-RDP

**OPPOSED MOTION FOR LEAVE
TO INTERVENE AS
DEFENDANTS
(Fed. R. Civ. P. 24)**

Proposed Defendant-Intervenors the States of New York, California, Colorado, Connecticut, the District of Columbia, Illinois, Massachusetts, Minnesota, Nevada, New Jersey, New Mexico, Oregon, Rhode Island, Vermont, Virginia, and Washington; the cities and counties of Cameron County, Texas; Central Falls, Rhode Island; Chicago, Illinois; Hidalgo County, Texas; Monterey County, California; New York, New York; Philadelphia, Pennsylvania; Providence, Rhode Island; and Seattle, Washington; and the United States Conference of Mayors, respectfully request that the Court grant them leave to intervene as defendants in this action as of right pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure, or in the

alternative, grant them permissive intervention pursuant to Rule 24(b)(1)(B) of the Federal Rules of Civil Procedure. Before filing this motion, counsel for the Proposed Defendant-Intervenors contacted the existing parties to determine their position on this motion to intervene. Plaintiff the State of Alabama and Plaintiff Representative Brooks have indicated that they oppose this motion to intervene. The Federal Defendants have advised that they take no position on this motion. The Martinez Defendant-Intervenors and the Local Government Defendant-Intervenors do not oppose intervention.

In support of this motion, the Proposed Defendant-Intervenors rely on the accompanying Memorandum of Law, the Proposed Answer filed with this motion in compliance with Fed. R. Civ. P. 24(c), the pleadings and papers on file in this action, and any argument and evidence that is presented on the hearing of this motion.

DATED: August 12, 2019

Respectfully submitted,

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**Application for admission pro hac vice forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2019, I electronically filed the foregoing Motion for Leave to Intervene as Defendants, a supporting Memorandum of Law, and a proposed Answer in Intervention with the Clerk of the District Court using the CM/ECF system, which will send notification of such filing to all counsel of record in this proceeding.

I also hereby certify that I have caused to be mailed by First Class Mail the document to the following non-CM/ECF participant:

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DATED: August 12, 2019

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